



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 29, 2005

Andrea Green, Treasurer
Human Rights Campaign PAC
1640 Rhode Island Avenue NW
Washington, DC 20036

Response Due Date:
May 31, 2005

Identification Number: C00235853

Reference: Amended September Monthly Report (8/1/04-8/31/04), received
12/16/04

Dear Ms. Green:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule E of your report discloses a total of \$2,890.40 in payments to your connected organization for "communication expenses." In a miscellaneous electronic submission to the Commission on 11/19/04, you stated that the memo entries on Schedule E were "a draw down on an amount advanced to the Human Rights Campaign by HRC PAC earlier." However, your report(s) does not appear to disclose any apparent advanced payments to support this independent expenditure(s).

Please be advised that your committee must report any "advance payments" made to your connected organization on Schedule B for Line 21(b), during the appropriate reporting period in which it was made as regular entries included in the totals for your report (not memo entries). These disbursements must be clearly identified as "advanced payment(s)" along with the specific purpose for the advance. Subsequently, when the committee uses the corporate or labor organization resources or facilities in connection with a contribution/expenditure on behalf of a candidate, the fair market value attributed to such services should be disclosed as negative amounts on Schedule B for Line 21(b) with a corresponding positive entry

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on the appropriate line reflecting the activity conducted on behalf of the candidate (in-kind contributions on Schedule B for Line 23 or independent expenditures on Schedule E for Line 24). Please amend your report to clarify this discrepancy and properly disclose this activity. For additional information, please refer to the enclosed sample of properly reported advanced payments for the use of resources and facilities.

-Schedule E of your report indicates that your committee made independent expenditures during this reporting period. Further, while your committee did file the required 48 Hour Notice notice(s) for the independent expenditures aggregating \$10,000 or more with respect to the General election, it appears that the notice(s) was incomplete (see attached). Please be advised that if any independent expenditures below \$10,000 have not been previously disclosed, they must be disclosed on the required 48 Hour Notice along with the independent expenditure(s) that triggered the notice requirement (see Advisory Opinion 2003-40). Please provide clarification regarding this activity.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1141.

Sincerely,



Kristine Adams
Campaign Finance Analyst
Reports Analysis Division

Missing 48 Hour Notice(s):

Name of Payee	Date	Amount	Purpose	Candidate
Image First	8/5/04	\$1,706.25	Merchandise	Bush, George W.
UPS	8/19/04	\$15.97	Shipping	Bush, George W.
Image First	8/20/04	\$2,080.08	T-Shirts	Bush, George W.
Postmaster	8/20/04	\$37.00	Postage	Bush, George W.

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